

**KATZMELINGER**  
280 MADISON AVENUE, SUITE 600  
NEW YORK, NEW YORK 10016  
www.katzmelinger.com

Nicole Grunfeld  
Katz Melinger PLLC

o: 212.460.0047  
f: 212.428.6811  
ndgrunfeld@katzmelinger.com

April 5, 2022

**VIA ECF**

Hon. André M. Espinosa  
United States District Court, District of New Jersey  
Martin Luther King Jr. Courthouse  
50 Walnut Street, Room 2037  
Newark, NJ 07102

**Re: *Ramirez v. Smart Foods Inc et al.***  
**Civil Action No. 2:21-cv-12408**

Your Honor:

We represent plaintiff Marcelo Ramirez in the above-captioned matter, and submit this joint status letter together with counsel for defendants Smart Foods Inc. and Daniel Muñoz in advance of the status conference scheduled for April 8, 2022.

The parties have exchanged written discovery requests and responses, and are attempting to schedule depositions. Due to conflicting availability, the parties request an extension of the fact discovery deadline to May 31, 2022.

We thank the Court for its attention to this matter.

Sincerely,  
/Nicole Grunfeld/  
Nicole Grunfeld